

*REMARKS*

Claims 12-22 are pending and stand rejected. All rejections rely on Hanlan (U.S. Pat. No. 4,361,260, hereinafter "Hanlan") as allegedly teaching all or most elements of the claim. As previously noted, independent claims 12 and 18 each require a plurality of pulling units with adjustable leads. Referring to the claims, it will be appreciated that the claims recite elements such that the web cut registration relies upon local changes in dimension due to the elasticity of the web, induced by circumferential speed changes of at least one of the pulling units, as opposed to simple speed changes in the web as a whole, as performed by Hanlan.

This distinction flows from the express claim language and the elements recited. Thus, as Applicants previously noted, the rollers 25, 26, 27, and 28 of Hanlan do not represent the recited plurality of pulling units. Rather, they represent one pulling unit (rollers 25 and 26 acting together) and a cutting unit (knife 27 acting against roller 28). In response, the Office has stated as follows:

In response to applicant's argument regarding claim 12, where Hanlan (4,361,260), does not teach a plurality of pulling units, the Examiner disagrees. There is no language recited in claim 12, which distinguishes the two pulling units from the cross cutting device. Therefore, one of the pulling units can contain the cross cutting device.

However, this statement is plainly nonsensical. The claim expressly requires "guiding a web ... *TO* a cross-cutting device *VIA* at least two pulling units ..."

How can the web be guided *TO* the cross-cutting device *VIA* the cross-cutting device? That's like saying "I'm going to the store via the store." The requirement of guiding a web *TO* a cross-cutting device *VIA* at least two pulling units absolutely requires that the cross-cutting device is *not* one of the pulling units!

Put another way, if a part of the web is to be guided *TO* the cross-cutting device, then clearly the web is not yet *AT* the crosscutting device. But if the web is not yet *AT* the cross-cutting device, then how can the cross-cutting device nonetheless be guiding the web in any way? Obviously it can't. The broadest reasonable interpretation of any claim term must, at a very minimum, be logically self-consistent; that means that the recited pulling units (which must guide *TO* the cross-cutting device) do not double as the cross-cutting device itself.

Hanlan simply does not teach the recited *two* pulling units *and* a cross-cutting device. Rather, it very clearly teaches one pulling unit and a cross-cutting device. Whether or not Hanlan's cross-cutting device also pulls is irrelevant; Hanlan's cross-cutting device clearly does not meet the requirement of *guiding* the web to the cross-cutting device.


The remaining pending claims, being dependent from one of the above, also incorporate the limitation of a plurality of pulling units. Although a number of the dependent claims were rejected on the basis of Hanlan combined with Jackson, Jackson does not, as noted previously, teach the use of a plurality of pulling units. It is thus respectfully submitted that the pending dependent claims are patentable for at least the same reasons as discussed above with respect to the independent claims.

In view of the above explanation, Applicant respectfully submits that Hanlan omits a critical limitation of each claim, and as such, the pending claims are patentable. Applicant thus believes that the application is in proper condition for allowance, and respectfully requests that the application be passed to issue. If the Examiner feels that a telephone conference would expedite the prosecution of the subject application, the Examiner is invited to call the undersigned attorney.

#### *Conclusion*

Applicants respectfully submit that the patent application is in condition for allowance. If, in the opinion of the Examiner, a telephone conference would expedite the prosecution of the subject application, the Examiner is invited to call the undersigned attorney.

Respectfully submitted,



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